



Privacy Notice of PTRN

“Datacap” Ltd. (“**Datacap**”, “**we**”) is the data controller of the personal data received from the users (“**user**”, “**you**”) in connection with (i) browsing the PTRN web based software platform <https://ptrn.ai/> (the “**Platform**”) and the cookies we use; (ii) using user’s information for contacting and/or marketing purposes, (iii) your interaction with Pathearn (<https://pathearn.ai/>).

PTRN is part of a unique AI-powered decentralized network, aiming to make data accessible, affordable and transparent. (“**PTRN**”).

WHAT DATA DO WE COLLECT, WHY AND FOR HOW LONG DO WE KEEP IT?

1. Browsing the Platform.

When visiting (browsing) the Platform, we collect certain standard information that we need in order to:

- Provide, operate, and maintain the Platform
- Improve, personalize, and expand the Platform
- Understand and analyze how you use the Platform
- Develop new products, services, features, and functionality
- Find and prevent fraud

We usually collect (automatically) information from the log files which include, but is not limited to internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable and is use on an anonymous base. The purpose of the information is for analyzing trends, administering the site, tracking users’ movement on the website, and gathering demographic information.

2. Cookies and similar technologies.

We use cookies, web beacons and other similar technologies (collectively “cookies”) to optimize the users’ experience by customizing the Platform’s content based on visitors’ browser type and/or other information. Some of the cookies we used are the so called “essential” cookies which are strictly needed for the functionalities of the Platform and you cannot use it without such cookies. Other cookies are used for additional purposes valuable for us such as: to a) store information including visitors’ preferences, and the pages on the website that the visitor accessed or visited and/or to provide us with some analytics; b) for better targeting advertisements and/or c) for marketing purposes etc. (collectively referred to as “optional” cookies). You can see all types of cookies that we use on our cookie banner, including Google Analytics and can freely opt out or opt in the cookies except for the “essential” one.

The cookies we use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on your device. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent.



However, if you do not accept cookies, you may not be able to use some parts of our functionalities.

- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

- Essential cookies

Type: Session cookies

Administered by: Us

Purpose: These cookies are essential to provide you with services available through the Platform and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these cookies, the services that you have asked for cannot be provided, and We only use these cookies to provide you with those services.

- Notice acceptance cookies

Type: Persistent cookies

Administered by: Us

Purpose: These cookies identify if users have accepted the use of cookies on the Platform.

- Functionality cookies

Type: Persistent cookies

Administered by: Us

Purpose: These cookies allow us to remember choices you make when you use the Platform, such as remembering your login details or language preference. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Platform.

- Tracking and performance cookies

Type: Persistent cookies

Administered by: Third-Parties (e.g. Google Analytics)

Purpose: These cookies are used to track information about traffic to the Platform and how users use the Platform. The information gathered via these cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the



Platform. We may also use these Platform to test new pages, features or new functionality of the Platform to see how our users react to them.

About Google Analytics - Google Analytics stores cookies on your users' PCs to keep track of usage data. We use it to create better marketing campaigns which includes also targeting and retargeting of users. We use also / we do not use the remarketing functions of Google analytics.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

In addition to our cookie banner, you can also opt-out of having made your activity on the service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>.

3. Contact form and marketing

Name, email, message content

We have envisaged a contact form where you can share with us some thoughts or ask us any questions. For that we will need your **name/nickname** and **e-mail** to reach you back. We store this data only for the time we need to be in touch with you and a limited time after that. We do not store any other personal data which you may decide to share with us in your message to us.

If you agree to additionally provide you with marketing information and/or information about our services in the designated place provided on the Platform by clicking the box, your expressed consent and the provided e-mail are stored by us for the purpose of tracking its validity and until you refuse to receive such information as instructed by us in an easy way via the "Unsubscribe" link in each of our emails.

4. Pathearn services

When you receive or spend Tokens, as defined in our [Terms of Use](#), it would mean that you have an account and use the services of Pathearn at <https://pathearn.ai/> and that you have collected points from Pathearn which you would like to turn into Tokens. In this regard, you are aware of and comply with their [Privacy Notice](#) and their [Terms of Use](#), located on the platform of Pathearn, as indicated therein.

You can use your Tokens with your PATHEARN key to withdraw them at your which can be reached from our Platform.

5. Storage periods

We generally store your personal data for as long as it is necessary for performing the functional service of the Platform and to comply with our legal obligations. If you no longer want us to use your information that we access and store, you can request that we erase



your personal information. However, some data may still be stored for a certain period of time (but no longer than the storage purpose requires) or if information is necessary to comply with legal obligation or in order to maintain safety and data backup settings, prevent fraud or other malicious acts.

Please note that without the data listed above, the Platform cannot be used and cannot function.

While retention requirements vary by jurisdiction, information about our typical retention periods for different aspects of your personal information are described below.

Personal information collected to comply with our legal obligations may be retained after account closure for as long as required under such laws.

Contact Information such as your name and email address for marketing purposes is retained on an ongoing basis until you unsubscribe.

Information collected via technical means such as cookies, web page counters and other analytics tools is kept for a period of up to one year from expiry of the cookie.

When the personal data is no longer necessary for the purpose for which it was collected, we will remove any details that identifies you or we will securely destroy the records, where permissible and possible. However, we may need to maintain records for a significant period of time (after you cease using a particular service) as mandated by legal requirements (e.g. anti-money laundering laws).

ON WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

We need the data processed in connection with your registration for the operation of the Platform. The legal ground for such processing is our **legitimate interest** to offer you a better and easily accessible service.

It is also our **legitimate interest** to stay in touch with you when you reach us via our contact form.

In addition to the above, you are in a **contractual relationship** with us, as you use the Application and/or the Platform based on your agreement with our [Terms of Use](#) and base on this relationship we need certain data entering into the [Terms of Use](#) with us.

For some processing activities, we require your prior **consent**. This applies for example to some of our cookies and our direct marketing activities. You will always be prompted to take clear, affirmative action so that we can ensure that you agree with the processing of your personal data. This action may, for example, take the form of a checkbox. If you have given us your consent for processing operations, you may always change your mind, and withdraw your consent at any time and easily, following the designated hereabove steps. The withdrawal of your consent does not affect the lawfulness of processing based on your consent before its withdrawal.

In some cases, we have to process your personal data to comply with **legal obligations**. You may not be eligible for certain services if we cannot collect the personal data necessary to meet our legal obligations.



ACCESS TO DATA OF THIRD PARTIES-RECIPIENTS

We may share your information with selected third parties to perform functions required to provide certain services to you and/or in connection with our efforts to prevent and investigate fraudulent or other criminal activity. All such third parties will be contractually bound to protect data in compliance with all applicable privacy and non-privacy laws, including by entering into separate Data Processing Agreements. The categories of recipients may include:

- Our partner companies, including the one running the Pathearn platform at <https://pathearn.ai/>, partners helping us detect and prevent potentially illegal acts and violations of our policies;
- Providers of analytics and marketing automation platforms etc.
- Government institutions, the police and/or other authorities where we are required by law to do so.
- Buyers or other successor in the event of a merger and acquisition process.
- Our technical, legal, IT or other providers/consultants for a specific case, for a certain time required to carry out the consultation, only if it is necessary and/or in order to protect our legal rights and interests.

We will not rent or sell your personal data to any third parties, but we may (if applicable) share your information from tools like log files, and device identifiers and location data, with third-party organizations that provide automatic data processing technologies. We do not control or influence these third parties' tracking technologies or how they may be used.

With respect to the service providers which we use for the Application (Android or iOS depending on your device) please consult the correspondent websites and privacy policies to learn more about these services and their privacy options (including opt-out). We are not responsible for any usage of your personal data by these providers.

DATA TRANSFER

We do not transfer your personal data outside the EU and / or the European Economic Area. The cloud database of Datacap is located in Bulgaria.

For the purposes of data storage, we take your privacy seriously and, therefore, encrypt your personal data.

INFORMATION SECURITY

We are committed to ensure that the information you provide to us is protected. We have put in place appropriate technical and organizational measures and maintained a high level of protection of the data and information that reaches us.

YOUR RIGHTS

You have the right to require from us information about, copy of, access to or deletion of your personal data, as well as limit the processing that applies to you. You may object to the processing of the data. You have the right to information and comment on the automated processing of your data, in cases where and if we use one, of which you will be duly notified.



If you have not been able to correct your data yourself, you can ask us to correct or remove any information you consider to be inaccurate.

For any of the above requests, please contact us at: support@ptrn.ai

We may require additional proof of identity to protect your personal information from unauthorized access.

You can file a complaint to the data protection authority in your country. Contact details of the data protection authorities in all Member States can be found here - https://edpb.europa.eu/about-edpb/about-edpb/members_en.

CHILDREN'S INFORMATION

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

The Platform does not knowingly collect any personal data from individuals that are of age lower than 18. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

PRIVACY NOTICE UPDATES

This Privacy notice is updated from time to time. Whenever we do this, we post those updates at a visible place at the Application, the Platform and/or other places that we consider appropriate.